

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

COLLINS(plaintiff)

v.

MACDONALD (defendant)

CIVIL ACTION  
CASE NO. \_\_\_\_\_

03 - 30276 - MAP

COMPLAINT

1. The plaintiff is a resident of Franklin County Jail in Greenfield Massachusetts, and is a citizen of the United States
2. The defendant is a resident of Franklin County, and is a citizen of the United States.

Jurisdiction

3. This court has jurisdiction over this matter pursuant to 28 U.S.C subsection 1332.

FACTS

4. During my current incarceration in the Franklin County Jail I have been exposed to conditions that are both inhumane and unsafe.
5. The Franklin County jail is over one hundred years old and is lacking the basic safety equipment needed in case of fire, namely a 'Central Locking Device that can be controlled by any means other than by hand.
6. The cell size 6x8 do not meet the standards that have been set forth by the law.
7. The 6x8 ft. cell does not have the necessary accommodations, such as proper ventilation, a writing desk or ever a chair to sit on.
8. The area in which we are to consume our food in is within just feet from about seven toilets that malfunction on a regular basis.

9. The law library is not up to date, many of the books date back to the late 1980's.
10. On the date of Oct. 22, 2003, Sheriff Macdonald gave a statement to the Greenfield Recorder in which he himself acknowledged that the conditions here are unconstitutional.
11. WHEREFORE, the plaintiff demands judgment against the Defendants for damages to the amount of **\$2.5 million**, and such other relief that this Honorable Court may deem just and right within the confines of the law.
12. The Plaintiff humbly requests a trial by jury.

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